

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**APPLICATION FOR ORDER SHORTENING TIME**

TO: THE HONORABLE MICHAEL B. KAPLAN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,  
requests that the time period to notice a hearing on the *Debtor’s Motion for an Order Sealing the  
Redacted Portions and Exhibits of the Debtor’s Omnibus Reply in Support of Its Motion for an*

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

*Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “Motion to Seal”)<sup>2</sup> as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: the Motion to Seal should be heard along with all of the other related relief that the Court is scheduled to hear on May 3, 2023. The Court set the Debtor’s *Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “FCR Motion”) for hearing on May 3, 2023. [Dkt. 135]. The official committee of talc claimants (the “TCC”), the United States Trustee (the “US Trustee”), Paul Crouch, and Maune Raichle Hartley French & Mudd, LLC have filed objections to the FCR Motion [Dkts. 311, 321, 318, and 320, respectively]. The TCC and the US Trustee each filed motions to seal [Dkts. 312 and 322], and applications to shorten time related to the same [Dkts. 315 and 323]. This Court granted their applications [Dkts. 316 and 327].

2. The Local Rules of the United States Bankruptcy Court District of New Jersey (the “Local Bankruptcy Rules”) allow a reply to be filed and served no later than 4 days before the hearing date. D.N.J. LBR 9013-2. The Debtor timely filed a redacted version of its reply in support of the FCR Motion, along with underlying Motion to Seal seeking authority to keep certain information redacted and under seal. As a practical matter, the Motion to Seal should be heard with the FCR Motion, related objections and motions to seal being heard on May 3, 2023.

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion to Seal.

3. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion to Seal on May 3, 2023, or on a date and time which is most convenient for the Court.

4. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The applicant requests entry of the proposed order shortening time.

Dated: April 28, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

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